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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	No. CR-10-0541-CW
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	CONTINUE STATUS CONFERENCE
v.)	AND EXCLUDE TIME UNDER THE
)	SPEEDY TRIAL ACT
JAMIE LYNN SALVO, and DENAE)	
HARTSINCK,)	
)	
Defendants.)	
)	

IT IS HEREBY STIPULATED AND AGREED between the plaintiff through its attorney, Joshua Hill, and the defendants through their undersigned attorneys that the status hearing presently set for December 16, 2010, be continued to January 31, 2011 at 10:00 a.m. The parties require additional time to review the discovery and conduct any necessary investigation. The parties agree that the delay is not attributable to lack of diligent preparation on the part of the attorney for the government or defense counsel. For these reasons, the parties request that time under the Speedy Trial Act be excluded based on the need for reasonable time necessary for

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STIPULATION AND ORDER
No. CR-10-0541-CW

1 effective preparation, taking into account the exercise of due diligence. The parties agree that
2 the waiver covers all time between the date of this stipulation and January 31, 2011.

3
4 IT IS SO STIPULATED:

5 Dated: December 10, 2010

/S/
ANGELA HANSEN
Assistant Federal Public Defender
Attorney for Salvo

6
7
8 Dated: December 10, 2010

/S/
ED SWANSON
Swanson & McNamara LLP
Attorney for Hartsinck

9
10
11 Dated: December 10, 2010

/S/
JOSHUA HILL
Assistant United States Attorney

12
13 **ORDER**

14 GOOD CAUSE HAVING BEEN SHOWN, it is hereby ordered that the hearing in this
15 matter now scheduled for December 16, 2010 is hereby rescheduled for January 31, 2011 at
16 10:00 a.m. Based upon the representation of counsel and for good cause shown, the Court also
17 finds that failing to exclude the time between December 16, 2010 and January 31, 2011 would
18 unreasonably deny the government and the defense the reasonable time necessary for effective
19 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).
20 The Court further finds that the ends of justice served by excluding the time between December
21 16, 2010 and January 31, 2011 from computation under the Speedy Trial Act outweigh the best
22 interests of the public and the defendant in a speedy trial. Therefore, it is hereby ordered that the
23 time between December 16, 2010 and January 31, 2011 shall be excluded from computation
24 under the Speedy Trial Act. 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

25
26 DATED: December 10, 2010



HONORABLE DONNA M. RYU
United States Magistrate Judge